Exhibit K

09-50026-mg Doc 14173-11 Filed 11/28/17 Entered 11/28/17 20:55:22 Exhibit K

Message

From:

Steel, Howard S. [HSteel@brownrudnick.com]

Sent:

8/14/2017 19:30:27

To:

Martorana, Keith R. [KMartorana@gibsondunn.com]

Subject:

RE: Motors - GUC Trust Settlement Agreement - SUBJECT TO FRE 408

Got it, thanks

From: Martorana, Keith R. [mailto:KMartorana@gibsondunn.com]

Sent: Monday, August 14, 2017 7:30 PM

To: Steel, Howard S.

Subject: Re: Motors - GUC Trust Settlement Agreement - SUBJECT TO FRE 408

External E-mail. Use caution accessing links or attachments.

You can send now. Nothing to add in the note

On Aug 14, 2017, at 7:27 PM, Steel, Howard S. < HSteel@brownrudnick.com > wrote:

Thanks, want me to send now or wait?

Want any language added to the note to Arthur?

From: Martorana, Keith R. [mailto:KMartorana@gibsondunn.com]

Sent: Monday, August 14, 2017 7:26 PM

To: Steel, Howard S.

Subject: Re: Motors - GUC Trust Settlement Agreement - SUBJECT TO FRE 408

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We are waiting for final approval from client, but unlikely to come tonight. You are, however, authorized to send current versions to New GM this evening

On Aug 14, 2017, at 6:44 PM, Steel, Howard S. < HSteel@brownrudnick.com> wrote:

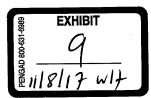
How's the trust looking on sign off?

From: Golden, Daniel [mailto:dgolden@AkinGump.com]

Sent: Monday, August 14, 2017 4:10 PM

To: Steel, Howard S.; Martorana, Keith R.; Weintraub, William P; Fox, Gregory W.; Newman, Deborah; Moss, Naomi; Williams, Matt J.; Gillett,

Gabriel K.; Chorba, Christopher; bobh@hmglawfirm.com; steve@hilliardshadowenlaw.com; tjp@tjhlaw.com;



<u>mehenry@thomasjhenrylaw.com</u>; <u>Lnorman@andrewsmyers.com</u>; kelly@hmglawfirm.com

Cc: Weisfelner, Edward S.; <u>Steve@hbsslaw.com</u>; <u>ChrisO@hbsslaw.com</u>; <u>ecabraser@lchb.com</u>; Geman, Rachel (External); <u>esserman@sbeplaw.com</u>; Forster, Jill L.

Subject: RE: Motors - GUC Trust Settlement Agreement - SUBJECT TO FRE 408

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I think that is right; participating holders are signed off subject to guc trust being signed off

Daniel H. Golden

AKIN GUMP STRAUSS HAUER & FELD LLP

One Bryant Park | New York, NY 10036-6745 | USA | Direct: <u>+1 212.872.8010</u> | Internal: <u>38010</u>

Fax: +1 212.872.1002 | dgolden@akingump.com | akingump.com | Bio

From: Steel, Howard S. [mailto:HSteel@brownrudnick.com]

Sent: Monday, August 14, 2017 4:06 PM

To: Golden, Daniel; Martorana, Keith R.; Weintraub, William P; Fox, Gregory W.; Newman, Deborah; Moss, Naomi; Williams, Matt J.; Gillett, Gabriel K.; Chorba, Christopher; bobh@hmglawfirm.com; steve@hilliardshadowenlaw.com; tjh@tjhlaw.com;

mehenry@thomasjhenrylaw.com; Lnorman@andrewsmyers.com; kelly@hmglawfirm.com

Cc: Weisfelner, Ed (External); Steve@hbsslaw.com;

<u>ChrisO@hbsslaw.com</u>; <u>ecabraser@lchb.com</u>; Geman, Rachel (External); <u>esserman@sbep-law.com</u>; Forster, Jill L.

Subject: RE: Motors - GUC Trust Settlement Agreement - SUBJECT TO FRE 408

We can send to him when everyone signed off - please advise if you have not already

To confirm will send to him: all of docs circulated to this group this morning. will <u>not</u> be sending him proffered evidence and expert reports

From: Golden, Daniel [mailto:dgolden@AkinGump.com]

Sent: Monday, August 14, 2017 3:48 PM

To: Martorana, Keith R.; Steel, Howard S.; Weintraub, William P; Fox, Gregory W.; Newman, Deborah; Moss, Naomi; Williams,

Matt J.; Gillett, Gabriel K.; Chorba, Christopher;

bobh@hmglawfirm.com; steve@hilliardshadowenlaw.com;

tjh@tjhlaw.com; mehenry@thomasjhenrylaw.com;

Lnorman@andrewsmyers.com; kelly@hmglawfirm.com

Cc: Weisfelner, Edward S.; Steve@hbsslaw.com;

ChrisO@hbsslaw.com; ecabraser@lchb.com; Geman, Rachel

(External); esserman@sbep-law.com; Forster, Jill L.

Subject: RE: Motors - GUC Trust Settlement Agreement -

SUBJECT TO FRE 408

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Can someone please advise me who will be in a position to send the final documentation to Arthur by cob today. We need to do this so he doesn't use this as an excuse at the Thursday chambers conference.

Daniel H. Golden

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212.872.8010 | Internal: <u>38010</u>

Fax: +1 212.872.1002 | <u>dgolden@akingump.com</u> | <u>akingump.com</u> | Bio

From: Martorana, Keith R.

[mailto:KMartorana@gibsondunn.com] **Sent:** Monday, August 14, 2017 3:46 PM

To: Steel, Howard S.; Weintraub, William P; Fox, Gregory W.; Golden, Daniel; Newman, Deborah; Moss, Naomi; Williams, Matt

J.; Gillett, Gabriel K.; Chorba, Christopher;

bobh@hmglawfirm.com; steve@hilliardshadowenlaw.com;

tjh@tjhlaw.com; mehenry@thomasjhenrylaw.com; Lnorman@andrewsmyers.com; kelly@hmglawfirm.com Cc: Weisfelner, Ed (External); Steve@hbsslaw.com;

ChrisO@hbsslaw.com; ecabraser@lchb.com; Geman, Rachel

(External); esserman@sbep-law.com; Forster, Jill L.

Subject: RE: Motors - GUC Trust Settlement Agreement -

SUBJECT TO FRE 408

On the DTC Notice, the percentage of Unitholders represented by Akin should be 65%. If you are controlling the final versions of the documents, can you please make that change?

At this point we do not have any further comments, but are obtaining final sign-off from our client.

Keith Martorana

Of Counsel

GIBSON DUNN

Gibson, Dunn & Crutcher LLP 200 Park Avenue, New York, NY 10166-0193 Tel +1 212.351.3991 • Fax +1 212.351.6391 KMartorana@gibsondunn.com • www.gibsondunn.com

From: Steel, Howard S. [mailto:HSteel@brownrudnick.com]

Sent: Monday, August 14, 2017 1:32 PM

To: Weintraub, William P < WWeintraub@goodwinlaw.com>;

Fox, Gregory W. <GFox@goodwinlaw.com>;

dgolden@akingump.com; dnewman@akingump.com;

nmoss@akingump.com; Williams, Matt J.

< MJWilliams@gibsondunn.com >; Gillett, Gabriel K.

<<u>GGillett@gibsondunn.com</u>>; Chorba, Christopher

<<u>CChorba@gibsondunn.com</u>>; <u>bobh@hmglawfirm.com</u>; <u>steve@hilliardshadowenlaw.com</u>; <u>tjh@tjhlaw.com</u>; <u>mehenry@thomasjhenrylaw.com</u>; <u>Lnorman@andrewsmyers.com</u>; <u>kelly@hmglawfirm.com</u>; <u>Martorana</u>, <u>Keith R. <<u>KMartorana@gibsondunn.com</u>> <u>Cc</u>: Weisfelner, Edward S. <<u>EWeisfelner@brownrudnick.com</u>>; <u>Steve@hbsslaw.com</u>; <u>ChrisO@hbsslaw.com</u>; <u>ecabraser@lchb.com</u>; <u>rgeman@lchb.com</u>; <u>esserman@sbeplaw.com</u>; Forster, Jill L. <<u>JForster@brownrudnick.com</u>> <u>Subject</u>: Motors - GUC Trust Settlement Agreement - SUBJECT TO FRE 408</u>

SUBJECT TO FRE 408

Please see attached proposed final execution versions of all of the documents. Redlines are to versions circulated Friday.

Please let us know any comments or questions and confirm when you are signed off. Thanks.

Howard S. Steel Brown Rudnick LLP Seven Times Square New York, New York 10036 212.209.4917 (direct) 732.757.1898 (cell) 212.938.2806 (direct fax) hsteel@brownrudnick.com

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